



Freshfields Bruckhaus Deringer US LLP

Via ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Silicon Valley
855 Main Street
Redwood City, CA 94063
T +1 650 618 9250 (Switchboard)
+1 650 461 8276 (Direct)
E justina.sessions@freshfields.com
www.freshfields.com

July 18, 2023

**Re: *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010 (PKC);
Singh v. Google, No. 1:23-cv-03651 (PKC)**

Dear Judge Castel:

Google respectfully requests permission to file a motion to dismiss the *Singh v. Google LLC* Putative Class Action Complaint. Pursuant to Your Honor's Individual Practices, we note that there is no conference currently scheduled.

Mr. Singh filed a putative class action complaint in the Central District of California on April 4, 2023. He is represented by the same counsel as the Advertiser Plaintiffs. The complaint contains the exact same substantive allegations and the exact same claims as the Advertiser Plaintiffs' Amended Complaint (Dkt. 399). Like all but one of the Advertiser Plaintiffs, Mr. Singh is also bound to arbitrate his claims against Google.

Google does not believe there are any "distinctions that warrant a different ruling" between the Advertisers' Amended Complaint and Mr. Singh's complaint. *See* Dkt. 562 ("The parties should proceed on the basis that the judge reading their brief is the author of the Opinion and Order of September 13, 2022 and should focus on any distinctions that warrant a different ruling in the case of Inform's SAC."). Google therefore asks to file a motion to dismiss Mr. Singh's complaint that incorporates by reference Google's arguments seeking dismissal of the Advertisers' Amended Complaint. *See* Dkt. 447. Google will also provide evidence that Mr. Singh is bound to arbitrate.

Respectfully submitted,

/s/ Justina K. Sessions
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FRESHFIELDS BRUCKHAUS
DERINGER US LLP
855 Main Street
Redwood City, CA 94063
Telephone: (650) 618-9250
Email: justina.sessions@freshfields.com

*Counsel for Defendants Google LLC,
Alphabet Inc., and YouTube LLC*

CC: All Counsel of Record (via ECF)